



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
WATER AND WATERSHEDS

EPA's Comments Regarding the Quality Assurance Project Plan for Groundwater Monitoring, Liberty/Bosma and Cow Palace Dairy Facilities, Granger, Washington, prepared for the Law Offices of Charles M. Tebbutt, P.C., dated January, 2014 ("CARE Groundwater Monitoring QAPP").

General Comments

1. There are references to a Health and Safety Plan (HASP) in Section 1.5, but it is not included. EPA does not approve other entities' HASPs; however, we generally ensure that parties conducting work under our oversight provide us with a copy. Provide a copy of the Health and Safety Plan (separate from the QAPP) to us.
2. Add a statement to the CARE Groundwater Monitoring QAPP that CARE will contact the EPA and the Arcadis Project Coordinator a minimum of 14 days prior to the expected first day of sampling to coordinate logistics regarding access, field presence and observation. Either EPA or Arcadis or both will be overseeing sampling of the monitoring wells.
3. Add text that requires the samplers to:
 - avoid any actions that result in contamination of the monitoring wells, or that would otherwise compromise the integrity of the monitoring wells;
 - leave the well in same condition as found; and
 - document any problems observed at any well and notify EPA and Arcadis immediately of such problems or any issues that could impact the wells.
4. Add language to the CARE Groundwater Monitoring QAPP indicating that CARE will provide all field measurements and analytical sample results to EPA in a timely manner once the sampling results are final. Indicate that the data will be shared with EPA within 15 days of being validated, and will be included in the sampling report when it is written. See specific comments below for details.
5. Add text that allows EPA or the dairy facilities to collect split samples at their discretion.

Specific Comments

1. Page i - Plan Approval
 - a. Include dates alongside the plan approval signatures to indicate the effective date of this project.